



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 3, 2016

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Ahmed Mohammed El Gammal, 15 Cr. 588 (ER)

Dear Judge Ramos:

Following yesterday's conference, and after consultation with defense counsel, the parties respectfully request that the Court set the following pre-trial schedule:

August 12, 2016

Defense CIPA or FISA Motion

September 23, 2016

Government Opposition to Defense CIPA or FISA Motion¹

September 30, 2016

Defense Reply to CIPA or FISA motion

October 3, 2016

Government Draft Exhibit List
Government 404(b) Notice
Government Expert Notice
Any Jury Questionnaire
Parties' Proposed Voir Dire
Parties' Proposed Requests to Charge
Parties' Proposed Verdict Sheet

October 17, 2016

Parties' Motions in Limine
Defense Expert Notice

¹ The Government is requesting this deadline after consultation with officials at the Department of Justice in Washington, following yesterday's conference.

Government Opposition to Jury Questionnaire (if any)

October 31, 2016

Parties' Oppositions to Motions in Limine

Week of November 14, 2016

If jury questionnaires are used, prospective jurors complete questionnaires and parties complete challenges based on questionnaires.

November 21, 2016, 2:30 p.m.

Final Pre-Trial Conference

Respectfully submitted,

PREET BHARARA
United States Attorney

By:



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